

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

RICHARD DASCHBACH, individually
and on behalf of all others similarly situated,

Case No. 1:22-cv-00313-PB

Plaintiff,

v.

VSC GROUP, LLC d/b/a COMPLETE CAR,
a Texas limited liability company,

Defendant.

**AFFIDAVIT OF MARTHA ORTEGA-LEON IN SUPPORT OF
DEFENDANT VSC GROUP, LLC'S 12(b)(2) MOTION TO DISMISS**

I, Martha Ortega-Leon, hereby certify:

1. I am over the age of eighteen and qualified to make this Affidavit.
2. I have personal knowledge of the facts stated herein and these facts are true and correct to the best of my knowledge.
3. I am the Chief Financial Officer for VSC Group, LLC ("VSC") and am authorized to make this Affidavit on behalf of VSC in support of VSC's Motion to Dismiss the Complaint filed in *Richard Daschbach v. VSC Group, LLC, dba as Complete Car*, Case No. 1:22-cv-00313-AJ.
4. VSC is a Delaware limited liability company that was formed and organized in the State of Delaware on November 5th, 2018.
5. VSC conducts its business matters in the State of Delaware.
6. VSC's address is 251 Little Falls Dr., Wilmington, DE 19808.
7. VSC is not a New Hampshire limited liability company.
8. VSC is not located in New Hampshire.

9. VSC's owners, directors, officers, and managers do not reside in the State of New Hampshire.
10. VSC does not conduct any kind of business in or hold any license from the state of New Hampshire, nor is it registered to do business in New Hampshire.
11. VSC does not own, lease, or occupy any real property in the State of New Hampshire, or maintain an office in New Hampshire.
12. VSC does not employ any employees, personnel, staff, agents, contractors, or other representatives to conduct business on its behalf in the State of New Hampshire.
13. VSC makes no contracts for any kind of business in the State of New Hampshire.
14. VSC does not market, advertise, or promote any services or products of any kind in the State of New Hampshire.
15. VSC is not named "VSC Group LLC dba Complete Car", did not register a dba named "Complete Car" and does not hold itself out as "Complete Car".
16. VSC does not engage in telemarketing or other related activities.
17. VSC did not call Richard Daschbach or have any dealings with him.
18. VSC does not sell car warranties.

Further, Affiant sayeth not.

/s/ *Martha Ortega-Leon*
Martha Ortega-Leon

Sworn to and subscribed before me, the undersigned Notary Public, on this 28th day of October 2022.

/s/ *Jillian Ibarra*
Notary Public in and for the State of California